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17 Counsel had complied with LR IA 10-2

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19 IN THE UNITED STATES DISTRICT COURT
20 FOR THE DISTRICT OF NEVADA
21 NORTHERN DIVISION

22
23 DANIEL E. NAHOURAI,)
24 Plaintiff,)
25 v.) CIVIL ACTION NO.
26 KILOLO KIJAKAZI,) 3:21-cv-00456-CLB
27 Acting Commissioner of)
28 Social Security,) MOTION FOR EXTENSION OF
Defendant.) TIME TO FILE PLAINTIFF'S
MOTION FOR REVERSAL
AND/OR REMAND AND
SUPPORTING BRIEF

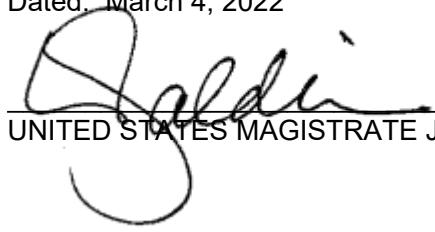
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30 AND NOW comes plaintiff, by and through counsel, Mark D. Barrett, Esq. and Hal
31 Taylor, Esq., and respectfully requests an extension of time of Thirty (30) DAYS to file his
32 Motion for Reversal and/or Remand and Supporting Brief. This is Plaintiff's first request for an
33 extension of time.

1 There is good cause for this request. The certified administrative record in the case is
2 1,170 pages and plaintiff intends on raising multiple fact-intensive issues, which combined with
3 an unusually busy briefing schedule has resulted in the need for this request. As the Court is
4 undoubtedly aware, defendant has been diligently working to “catch-up” the backlog of certified
5 transcripts due in federal court Social Security disability appeals nationwide, which has had the
6 effect of significantly increasing the number of cases calendared for briefing.¹ As a result,
7 plaintiff respectfully requests a 30-day extension of time to file his opening brief; plaintiff will
8 endeavor to submit his brief in advance of the extended deadline, but based on the foregoing
9 respectfully requests an extension in order to ensure that the issues are fully and concisely
10 presented to the Court.

12 Counsel for the defendant has been contacted and has no objection to this motion being
13 granted, provided that SSA is allowed a concomitant extension of time to file its response.
14

16 Plaintiff's opening brief is due on or
17 before April 11, 2022.

18 IT IS SO ORDERED.
19 Dated: March 4, 2022

20 
21 UNITED STATES MAGISTRATE JUDGE

22 BY: /s/ Hal Taylor
23 Hal Taylor, Esq.
24 Local Counsel
25 March 4, 2022

26 BY: /s/ Mark D. Barrett
27 Mark D. Barrett, Esq.
28 Pro Hac Vice Attorney for Plaintiff
March 4, 2022

Certificate of Service

29 I hereby certify that on the 4th day of March, 2022, I electronically filed the foregoing
30 with the Clerk of the District Court using its CM/ECF system, which would then electronically

31 ¹ In affidavits filed in many Social Security disability appeals from Jebby Rasputnis, SSA's
32 Executive Director of the Office of Appellate Operations, Defendant reports that the Agency has
33 essentially doubled the rate of production that existed pre-COVID-19 pandemic (from an average
34 of 300-400 hearing transcriptions per week prior to the pandemic and to its current capacity to
35 produce more than 700 per week).

1 notify the following CM/ECF participants on this case:

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3 Allison Cheung, Esq.
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5 Office of the General Counsel
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7 San Francisco, CA 94105
8 allison.cheung@ssa.gov

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/s/ Hal Taylor
Hal Taylor, Esq.

/s/ Mark D. Barrett
Mark D. Barrett, Esq.